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Hitachi Electronic Devices (USA), Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:

DIRECT PURCHASER CLASS ACTION

Case No. 07-5944 SC

MDL No. 1917

**STIPULATION AND [PROPOSED]  
ORDER REGARDING SETTLEMENT  
NOTICE**

Judge: Hon. Samuel Conti

1 WHEREAS, on January 8, 2014, this Court entered its Order Granting Class Certification  
 2 and Preliminary Approval of Class Action Settlement with the Hitachi Defendants (Dkt. No.  
 3 2311) (“Hitachi Preliminary Approval Order”), which granted certification of a Direct Purchaser  
 4 Plaintiff (“DPP”) class and preliminary approval of DPPs’ settlement with Hitachi, Ltd., Hitachi  
 5 Displays, Ltd. (n/k/a Japan Display Inc.), Hitachi Asia, Ltd., Hitachi America, Ltd., and Hitachi  
 6 Electronic Devices (USA), Inc. (collectively “Hitachi”);

7 WHEREAS, the Hitachi Preliminary Approval Order set deadlines for, *inter alia*, notice  
 8 of the settlement to the class, objections, and requests for exclusions;

9 WHEREAS, DPPs have recently reached a settlement with Samsung SDI Co. Ltd. (f/k/a  
 10 Samsung Display Devices Co., Ltd.); Samsung SDI America, Inc.; Samsung SDI Brasil, Ltd.; (4)  
 11 Tianjin Samsung SDI Co., Ltd.; Samsung Shenzhen SDI Co., Ltd.; SDI Malaysia Sdn. Bhd.; and  
 12 SDI Mexico S.A. de C.V. (collectively, “Samsung SDI”);

13 WHEREAS, the Settlement Agreement with Hitachi (which has been preliminarily  
 14 approved by this Court) states in paragraph 19(b) that “If Lead Counsel enters into any other  
 15 settlements on behalf of the Class before notice of this Agreement is given to the Class, Lead  
 16 Counsel shall use its reasonable best efforts to provide a single notice to prospective Class  
 17 members of all of the settlements”;

18 WHEREAS, all parties believe it would further judicial efficiency and would save the  
 19 class a significant amount of money to provide notice of both settlements in a single notice, and  
 20 proceed on a joint briefing and hearing schedule;

21 IT IS HEREBY STIPULATED AND AGREED by and between counsel for the DPPs and  
 22 counsel for Hitachi in the above-captioned actions, as follows:

- 23 (1) All deadlines set forth in the Hitachi Preliminary Approval Order are vacated; and
- 24 (2) DPPs and Samsung SDI will move for preliminary approval of the settlement  
 25 between DPPs and Samsung SDI at the earliest practical time, at which time a joint  
 26 schedule for both the Hitachi and Samsung SDI settlements can be set.

27 The undersigned Parties jointly and respectfully request that the Court enter this  
 28 stipulation as an order.

1 Dated: January 14, 2014

SAVERI & SAVERI, INC.

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24 *Ltd., Hitachi America, Ltd., and Hitachi Electronic*  
25 *Devices (USA), Inc.*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)**

I, R. Alexander Saveri, attest that concurrence in the filing of this document has been obtained from all signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 14, 2014, at San Francisco, California.

/s/ R. Alexander Saveri

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: January 21, 2014



Hon. Samuel Conti  
United States District Judge

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